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Of Counsel:
MARSHALL A. MINTZ

August 24, 2022

Hon. Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

Re: United States v. Franzone
21 CR 446 (VSB)

Dear Judge Broderick,

We represent Defendant Andrew Franzone ("Franzone") in the above-captioned case. We write to request permission for Mr. Franzone to travel to Florida later this week.

Mr. Franzone would travel to Florida on Friday, August 26, 2022 and return to New York on Saturday, August 27, 2022. The trip would allow him to meet with counsel in Florida concerning pending matters in the U.S. District Court for the Southern District of Florida and the Bankruptcy Court for the Southern District of Florida.

We have conferred with the Government, and have been advised that the U.S. Attorney's Office has no objection to this request.

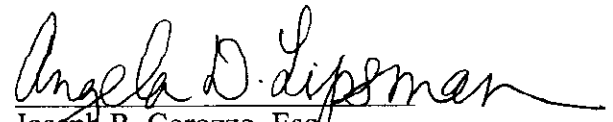
We have also reached out to Pretrial Services, and have been advised that Pretrial Services also has no objection to this request. Pretrial Services has been sent an anticipated itinerary. Should the application be granted, Mr. Franzone will confirm the flight times for Pretrial Services.

We note that the Court granted Mr. Franzone's last application to travel. Order, dated June 7, 2022 (ECF # 29).

Wherefore, we respectfully request that Mr. Franzone be permitted to travel to Florida from Friday, August 26, 2022 to Saturday, August 27, 2022.

Thank you for your consideration.

Respectfully submitted,


Joseph R. Corozzo, Esq.
Angela D. Lipsman, Esq

cc: AUSAs Alexander Rossmiller and Kiersten Fletcher (via ECF)
Pretrial Services Officer Jazzlyn Harris (via email)